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Acting Under Authority Conferred
By 28 U.S.C. § 515
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA, *ex rel.*
JORDAN C. SCHNEIDER,

Plaintiffs,

v.

PACIRA PHARMACEUTICALS, INC.,

Defendant.

Hon. Claire C. Cecchi

Civil Action No. 14-7021 (CCC)

JOINT STIPULATION OF DISMISSAL

The United States, the named states of Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Montana, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Oklahoma, Rhode Island, Tennessee, Texas, Virginia, Wisconsin, and the District of Columbia (the “Named States”), and relator Jordan C. Schneider (the “Relator”), by their undersigned counsel, pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, hereby stipulate that:

1. The United States has filed a Notice of Election to Intervene in Part for Settlement Purposes, dated July 28, 2020 (the “Election Notice”);
2. The United States, the states of Arkansas, California, Florida, Georgia, Illinois, Louisiana,

Maryland, Massachusetts, Michigan, New York, North Carolina, and Texas (the “Settling States”), the Relator, and Defendant Pacira Pharmaceuticals, Inc. (“Pacira”) have reached settlement agreements (together, the “Settlement Agreements”) that require the United States, the Settling States, and the Relator to file a Joint Stipulation of Dismissal with respect to all claims against Pacira following the payment of the settlement amounts;

3. The United States, the Settling States, and the Relator have received full payment from Pacira due under the Settlement Agreements;

4. The claims in the above-captioned action asserted against Pacira shall be dismissed, subject to the terms and conditions set forth in the Settlement Agreements, as follows upon the filing of this stipulation with the Clerk of the Court, with each party to bear its own costs except as expressly provided to the contrary in the Settlement Agreements:

- a. The United States’ and the Settling States’ claims against Pacira are dismissed with prejudice as to the Covered Conduct, as that term is defined in the above-referenced Election Notice,
- b. All other claims asserted on behalf of the United States and the Named States are dismissed without prejudice, and;
- c. The Relator’s claims against Pacira are dismissed in their entirety, with prejudice.

With this stipulation the United States, the Named States, and the Relator are also filing a proposed order dismissing the Complaint.

Respectfully submitted,

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By 28 U.S.C. § 515

Dated: August 3, 2020

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THE NAMED STATES

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